The Free Expression Policy Project

www.fepproject.org

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04-261

May 1, 2007

2007 MAY -7 P 2: 11

Kevin Martin, Chair Federal Communications Commission 445 12th Street SW Washington, DC 20554

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Federal Communications Commission Office of the Secretary

Dear Commissioner Martin:

I read with interest your separate opinion in the FCC's April 25 report, *In the Matter of Violent Television Programming and Its Impact On Children*. Given the agency's recommendations to Congress, there is little doubt that this issue will remain in the news, and that clarity about social science research into the effects of media violence will be important.

Your opinion states that "research on whether watching violent programming actually causes aggressive behavior in children is inconclusive," but adds that "major studies, including those by the Surgeon General and the Federal Trade Commission, have found that exposure to violent content on TV is associated with an increase in aggressive or violent behavior in children. ... In other words, the evidence does not prove causation, but it does demonstrate a strong correlation. These findings make clear, and the Commission today affirms, that exposure to violent programming can be harmful to children."

Of course, many things "can" cause other things to happen; when it comes to violence or aggression, there are multiple factors that influence the behavior of children (and adults). But correlation easily morphs into causation, and "can" easily morphs into "does" in the sound-bite arena of politics.

I studied the social science literature on media violence in depth as part of the research for my book *Not in Front of the Children*. I enclose a copy of the book, and I hope you will take a look especially at the "Media Effects" chapter when you have a chance. The psychological question of causality in the context of art or entertainment is complex and, as I conclude, really not susceptible to scientific measurement. The studies are rife with dubious methodologies, and the numbers are often manipulated in an effort to produce positive findings. The results overall are null.

As I acknowledge in the book, and in many of the materials on the Free Expression Policy Project website, the inability of science to prove harmful effects from something as broad and variously defined as TV violence does not mean that there shouldn't be cause for concern about the messages children are getting from popular culture. But we should not kid ourselves that there is scientific proof of adverse effects — or that there is any empirical basis for legislation, even if Congress could come up with a sufficiently specific definition of what is thought to be harmful.

Thanks for your interest and your careful attention to all the issues before the Commission.

Sincerely,

Marjorie Heins

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